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*Attorneys for Movants,
American General Life Insurance Company*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AMERICAN GENERAL LIFE INSURANCE :
COMPANY :

Plaintiff, :

vs. :

STANLEY MANN, THE STANLEY MANN :
2007 INSURANCE TRUST, CHRISTIANA :
BANK & TRUST CO., as Trustee, and JOHN :
DOES 1- 10, :

Defendants. :

Misc. No. 11-cv-1057

(Case Pending in the District of Delaware)
(Civil Action No: 1:09-cv-00434-GMS)

**NOTICE OF MOTION TO SEAL
CERTAIN DOCUMENTS**

TO: William T. Walsh, Clerk
United States District Court
50 Walnut Street
Newark, NJ 07101

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PLEASE TAKE NOTICE that on March 21, 2011, the undersigned attorneys for plaintiff, American General Life Insurance Company (“American General”) shall move before this Court for an **Order to Seal Exhibit A; and Exhibits C through F; and Exhibit I** to American General’s Motion to Compel Ravi Dattatreya’s compliance with a subpoena.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys will rely upon this Notice of Motion, Certification of Robert P. Lesko in Support of Motion, and proposed Form of Order in support thereof.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument in the event of opposition.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

s/ Karen D. Peck
Karen D. Peck

Dated: February 25, 2010